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ABSTRACT

The report urges that every seller review, and where necessary modernize, his internal complaint-handling procedures and his methods for resolving disputes in the light of the following recommendations: (1) The handling of consumer complaints should be swift, personalized, courteous, and as effectively managed as any other function of prime importance to the company, including increased personnel training in the handling of consumer communications, complaints follow-up, and appropriate involvement by senior management; (2) the money-back policy should be fully explored by companies not now offering it, and should be adopted wherever feasible as a means to resolve directly disputes with consumers; and (3) where refunds are not a practical course of action, the feasibility of third party complaint settlement procedures such as mediation and arbitration should be considered by sellers as an alternative form of redress. In addition to expanding on these recommendations, the report includes two case studies designed to illustrate the every-day application of these suggested approaches to consumer redress. (WL)

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> "In recent months I have been gratified by the increasing desire of the business community to take a more active role in meeting the concerns of the American consumer. These businessmen recognize that the concerns are widespread and often spring from valid complaints. They also share my belief that neither the government nor the consumer movement can alone solve these problems, but that we must also rely upon the traditional goodwill and sound practices of the business community.
>
> Because of this growing interest, I have today signed an executive order creating the National Business Council for Consumer Affairs..."
>
> Richard Nixon
> August 5, 1971

Responsive Approaches to Consumer

Complaints and Remedies

Report of the Sub-Council on Complaints and Remedies of the National Business Council for Consumer Affairs

October 1972

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CE 009 163

Honorable Peter G. Peterson
Secretary of Commerce
Washington, D.C. 20230

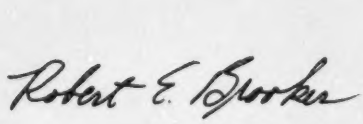
Dear Mr. Secretary:

We are pleased to transmit for your consideration the attached report of the NBCCA Sub-Council on Complaints and Remedies, "Responsive Approaches to Consumer Complaints and Remedies". The report seeks to promote greater responsiveness in the handling of complaints, and the development and use of timely and mutually satisfactory remedies for seller-buyer disputes.

In the report, the Sub-Council focuses on key procedural areas, i.e., methods by which consumer complaints are received, acknowledged, and handled by individual firms, and policies and procedures utilized by sellers for the resolution of disputes. As a result, its recommendations are applicable to the redress of legitimate consumer grievances related to the substantive issues concurrently being studied by the other NBCCA Sub-Councils.

We should like to take this opportunity to express our appreciation to the many individuals and groups who have shared with us their experience in the handling and resolution of consumer complaints. We urge that you convey this report widely to the nation's business community and to others interested in its recommendations.

Sincerely,



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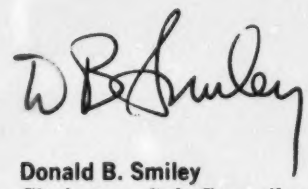
Chairman, National Business
Council for Consumer Affairs



Donald B. Smiley
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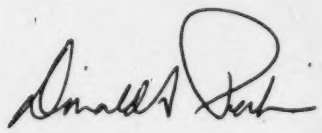
Complaints and Remedies



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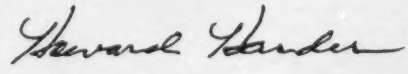

Howard C. Harder
Vice-Chairman, Sub-Council
on Complaints and Remedies

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Summary

This is a report of the Sub-Council on Complaints and Remedies of the National Business Council for Consumer Affairs. The purpose of the report is to stimulate individual action by business firms in developing and implementing innovative principles and procedures for handling consumer complaints—and for providing fair and effective remedies for expressions of genuine consumer dissatisfaction.

The report reflects the Sub-Council's twin objectives of promoting greater responsiveness in the *handling* of complaints—and of facilitating mutually satisfactory *resolutions* of seller-buyer disputes.

In sum, the Sub-Council urges that every seller review, and where necessary modernize, his internal complaint-handling procedures and his methods for resolving disputes in the light of the following recommendations:

RECOMMENDATION 1

THE HANDLING OF CONSUMER COMPLAINTS SHOULD BE SWIFT, PERSONALIZED, COURTEOUS, AND AS EFFECTIVELY MANAGED AS ANY OTHER FUNCTION OF PRIME IMPORTANCE TO THE COMPANY, INCLUDING INCREASED PERSONNEL TRAINING IN THE HANDLING OF CONSUMER COMMUNICATIONS, COMPLAINT FOLLOW-UP, AND APPROPRIATE INVOLVEMENT BY SENIOR MANAGEMENT.

RECOMMENDATION 2

THE MONEY-BACK POLICY SHOULD BE FULLY EXPLORED BY COMPANIES NOT NOW OFFERING IT, AND SHOULD BE ADOPTED WHEREVER FEASIBLE AS A MEANS TO RESOLVE DIRECTLY DISPUTES WITH CONSUMERS.

RECOMMENDATION 3

WHERE REFUNDS ARE NOT A PRACTICABLE COURSE OF ACTION, THE FEASIBILITY OF THIRD-PARTY COMPLAINT SETTLEMENT PROCEDURES SUCH AS MEDIATION AND ARBITRATION SHOULD BE CONSIDERED BY SELLERS AS AN ALTERNATIVE FORM OF REDRESS.

In addition to expanding on these recommendations, the report includes two case studies designed to illustrate the every-day application of these suggested approaches to consumer redress. These case studies are offered to encourage the development by each individual company of new or revised approaches to consumer remedies which are best suited to its own market needs and the particular problems of its customers.

Foreword

The National Business Council for Consumer Affairs was established by President Nixon on August 5, 1971, and counts among its members over one hundred corporate executives representing a wide cross-section of American business.

As stated in the President's executive order establishing the Council, its advice is to be furnished to the President, the Office of Consumer Affairs, the Federal Trade Commission, the Department of Justice, and other Government agencies as appropriate, through the Secretary of Commerce.

At its first meeting, the Council endorsed consumerism as a constructive force and concluded that the primary element in its mission would be the encouragement of positive action programs by industry to help anticipate and resolve consumer problems. To accomplish this, the Council's members were assigned to seven issue-oriented Sub-Councils covering advertising and promotion, packaging and labeling, warranties and guarantees, credit and related terms of sale, performance and service, product safety, and complaints and remedies.

This report concerns the initial projects of the Sub-Council on Complaints and Remedies. In selecting its priorities, the Sub-Council decided to examine corporate methods for handling and resolving consumer complaints. The report which follows presents the Sub-Council's analysis, conclusions, and recommendations on these subjects.

I Introduction

Consumer confidence is basic to the health of the American marketplace. In its broadest sense, this includes confidence in the soundness of the nation's economy. But it also means confidence that individual purchases will be transacted fairly, that buyers will receive honest value for their money, and that equitable redress will be available if reasonable satisfaction is not forthcoming.

In a marketplace in which perhaps billions of transactions take place daily, some business errors are bound to occur. But this statistical truth is small consolation to the consumer who believes he has been ill-served. His irritation ultimately generates the energy behind the many proposals for change in the marketplace.

Moreover, every uncorrected error in the quality of products and services, or in the ways those products and services are marketed and sold, undermines the consumer's goodwill toward the individual seller, and even toward the business community as a whole.

The best interests of consumers, businesses, and the nation therefore require the elimination of the root causes of consumer complaints to the maximum extent possible.

But they also require the modernization of the *ways* such complaints are handled by business firms. This need is only underscored by the rapid growth of governmental agencies at all levels which seek to use the prestige and power of governments to resolve consumer-business disputes.

Once a consumer complaint is expressed, three general avenues are available for resolution of the problem:

● **1. Direct Consumer-Business Contacts:** This is the most desirable field of complaint settlement. The policies and guidelines discussed on the following pages all stem from a desire to streamline complaint handling and settlement in order to maximize the proportion of consumer dissatisfactions equitably resolved between seller and buyer.

● **2. Third-Party Complaint Settlement Systems:** As a fallback for those cases in which it is not possible to achieve mutually satisfactory resolution of consumer complaints without external assistance, various forms of private sector mediation and arbitration need to be developed and explored. These, too, are discussed in this report.

● **3. Legal Remedies:** With the expansion and extension of direct and third-party voluntary channels for the resolution of consumer-business disputes, consumer recourse to litigation should need to be taken less frequently. Nonetheless, legal remedies which are fair and expeditious, which do not impose onerous or expensive burdens on either side, and which are convenient especially for consumers, clearly are in the best interests of both consumers and the business community. If existing legal remedies do not adequately meet this standard, they should be reformed or replaced.

There has long been a pressing need for in-depth exploration of the whole spectrum of consumer legal remedies, existing and proposed. An analysis recently begun by the National Institute for Consumer Justice will provide the foundation for a national dialogue on this subject.

This report therefore stresses the better utilization of *non*-legal techniques for redressing consumer grievances.

II Complaint Management

It is always preferable for complaints to be resolved wholly, voluntarily, and directly between sellers and consumers. This tenet should be reflected in every procedure established by business firms to handle and resolve consumer complaints. Accordingly, we recommend:

RECOMMENDATION 1

THE HANDLING OF CONSUMER COMPLAINTS SHOULD BE SWIFT, PERSONALIZED, COURTEOUS, AND AS EFFECTIVELY MANAGED AS ANY OTHER FUNCTION OF PRIME IMPORTANCE TO THE COMPANY, INCLUDING INCREASED PERSONNEL TRAINING IN THE HANDLING OF CONSUMER COMMUNICATIONS, COMPLAINT FOLLOW-UP, AND APPROPRIATE INVOLVEMENT BY SENIOR MANAGEMENT.

There are no universal techniques by which this objective can be accomplished, but there are certain general principles which should guide complaint-handling activities by individual businesses. Consumers do not register complaints with only a casual interest in their disposition. The mere communication of a problem involves at least an inconvenience, and frequently an out-of-pocket expense. Strong personal feelings are also often involved. All these considerations should be borne in mind in reviewing the basic principles which should underlie fair and effective complaint handling.

Basic Principles: "... swift and personal"

- Responses to consumer correspondence should be swift. Even in circumstances where a complete reply is not immediately possible, a letter or call of acknowledgment should be made within a few days, to be followed at the earliest possible time with a full reply.

- Communications from a consumer are wholly individual and personal. Business replies should therefore also be personalized and individualized to the greatest possible extent.

- In the same spirit of promoting a mutually sympathetic dialogue on the part of business and consumers, direct personal contacts should be encouraged—face-to-face whenever possible, but at least by telephone to the maximum extent feasible.

- Although the feasibility of toll-free long distance consumer calling to an advertised number needs cost/benefit evaluation before being adopted by national or regional sellers, efforts to promote personal contacts of this sort from consumers are highly desirable in principle, not only to enable them to register complaints with greater ease but also to facilitate suggestions and requests for information.

These efforts require renewed attention to the forms of contact between business and consumers. They also require that intra-company channels and procedures be closely examined to assure that unnecessary obstacles are not being placed in the way of expeditious, courteous, and personalized communications with consumers and the ultimate resolution of both the complaint and the underlying problem. On the contrary, sellers should take steps to inform consumers about available channels for complaint and redress; a complaint unregistered is no less significant in the harm it creates than a complaint mishandled or unresolved.

The role of senior management extends well beyond the establishment of basic complaint handling systems. This function should receive continuing attention and review, in the same manner as other significant corporate activities which involve relations both with customers and the public at large.

Other company executives also need to become more cognizant of the importance of rapid, effective, and personalized service on all consumer matters, including complaint handling. The larger firm should be especially sensitive to the need for such awareness in order to obviate assertions that

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consumer communications become lost in big companies.

The following guidelines merit the most serious consideration by every business enterprise:

Six Guides to Effective Complaint Management

1. Consumer complaints should be coordinated by specialists within each company.

2. Management should provide adequate training to all personnel in direct public contact concerning the accepted techniques and procedures of handling consumer complaints and other communications.

3. For items of large initial consumer cost, complaint dispositions should be audited to assure that satisfaction has in fact been given.

4. Senior management should regularly review the volume, nature, and disposition of consumer complaints. This review should specifically include samples of actual complaints and some personal contact with consumers with grievances.

5. Trend analysis and other summaries of complaint data should be developed periodically in order to identify emerging problems and opportunities for improvement.

6. Consumers should be provided with information regarding available channels of redress, either at the point of purchase or on the package, in use instructions, or in other literature accompanying the product or service.

These guides would lead to more responsive *handling* of complaints, but the need for effective *resolution* of disputes is equally great.

III Consumer Redress

The principal responsibility for satisfying a displeased consumer lies with the seller. The policies which will provide this satisfaction vary widely depending on the nature of the product or service, the terms of purchase, the customer's initial use, and a number of other factors. There is no single panacea covering all market situations which will provide universal relief for the dissatisfied consumer.

Direct Redress: the Money-Back Policy

There is, however, one mode of consumer redress which has not been as fully utilized by sellers as it might, and which therefore merits the most serious consideration by industries which do not presently utilize it:

RECOMMENDATION 2

THE MONEY-BACK POLICY SHOULD BE FULLY EXPLORED BY COMPANIES NOT NOW OFFERING IT, AND SHOULD BE ADOPTED WHEREVER FEASIBLE AS A MEANS TO RESOLVE DIRECTLY DISPUTES WITH CONSUMERS.

Currently, the use of refund policies is limited for the most part to industries offering frequently purchased products of low unit price and to large food and general merchandising retailers. A broader range of consumer industries should consider adoption of refund policies as a general redress for consumers.

The question of feasibility, of course, is one that must be examined by each industry or company on its own. Such an examination should be conducted searchingly and objectively, and should take careful account of both costs and benefits including potentially higher consumer prices, contemporary attitudes regarding the mutual obligations of buyers and sellers, and the intangibles of public repute and consumer good will.

Consumers, too, need to consider relative costs and benefits as they utilize refund policies. Returns inevitably increase sellers' costs and higher costs contribute to higher prices. In their own interests, therefore, consumers need to help guard against excessive or abusive use of money-back guarantees.

The following guidelines to a money-back policy are offered for consideration:

- Cash refunds should be offered to dissatisfied consumers wherever practicable. Sellers may wish to offer in lieu of cash refunds the option of credit on account, exchange, replacement, or coupon for replacement—with the buyer being permitted the choice between refund or option but in such a way that expensive exchanges of correspondence are avoided. (Product warranties should not be considered such an option since the consumer is not usually permitted to return the product.)

- Products should be accepted for refund if the product is in substantially as good condition as when received, is resellable, and is returned within a specified, limited, reasonable period of time or extent of use. Proof of purchase and a legitimate reason for dissatisfaction are also reasonable requirements.

Some sellers may wish to go beyond these action guides and impose even fewer conditions.

Third-Party Redress: Mediation and Arbitration

It must be recognized that money-back policies in one form or another are easier for some industries to implement than for others. Indeed, the requirements of law or marketplace economics absolutely prohibit in some instances any kind of money-back policy. Therefore:

RECOMMENDATION 3

WHERE REFUNDS ARE NOT A PRACTICABLE COURSE OF ACTION, THE FEASIBILITY OF THIRD-PARTY COMPLAINT SETTLEMENT PROCEDURES SUCH AS MEDIATION AND ARBITRATION SHOULD BE CONSIDERED BY SELLERS AS AN ALTERNATIVE FORM OF REDRESS.

Third-party complaint settlement systems utilize the involvement of a party external to the complaint to mediate or arbitrate the dispute to resolution. Some third-party systems, particularly those involving mediation or non-binding arbitration, have been available for a number of years. Others, especially those offering binding arbitration, are relatively new. A number of experiments involving binding arbitration are currently being undertaken and out of these will come more concrete knowledge than now exists concerning what is practicable and preferable.

In the meantime, there are several general principles which should apply if complaint settlement procedure is to be fair, effective, and acceptable:

- **First,** third-party complaint systems should provide for recourse—at the consumer's initiative—to some independent mechanism to achieve resolution of consumer-business disputes when direct discussions between buyer and seller fail.

- **Second,** these third-party systems must be of unquestioned impartiality and integrity. Whether or not they are financially supported by sellers, they should be insulated from pressures to judge in favor of one or another party in any given case. Funding should avoid assessing costs to sellers case-by-case. These costs are best established on either an industry-wide or community-wide basis, or both.

- **Third,** these complaint settlement systems should stress consumer convenience. Geographic location, hours of operation, the extent of conditions and requirements, and the complexity of procedures should all be designed with the convenience of the consumer as the paramount consideration. There should be little or no charge to consumers who utilize the system.

- **Fourth,** third-party redress systems will generally rely most heavily on the tools of mediation and non-binding arbitration, recommending an equitable solution for final decision by both consumer and seller. Where possible, however, and depending on the applicable provisions of state law, sellers should consider binding themselves in advance to acceptance of the recommended solution, contingent upon comparable agreement by the consumer.

- **Fifth,** disputes arising out of the full range of consumer-business transactions are appropriate for consumer mediation or arbitration with the exception of those covered by money-back or related policies. However, allegations of fraud or other violations of criminal law should be excluded, as should complaints regarding rates and similar matters regulated by law or Government agencies. Cases involving product liability claims should be considered on their individual merits as to their feasibility for settlement by mediation or arbitration.

Some trade associations are currently involved in the design of complaint systems applicable to the particular problems of their industries. The approach taken by the appliance industry through the Major Appliance Consumer Action Panel (MACAP) is one which other consumer industries may wish to consider as a possible prototype for their own needs.

At the community level, the efforts of the Better Business Bureaus (BBB) are especially significant for their use of, and experimentation with, a variety of techniques including medi-

ation and binding arbitration to resolve consumer-business disputes. Other local business organizations, notably Chambers of Commerce, could develop programs which supplement those of BBB's in larger localities or which substitute for them in communities in which no BBB exists.

Conclusion: "... an unrelenting search"

In a time when many are calling into question the basic honesty and integrity of the marketplace and the firms doing business there, every enterprise should re-emphasize its commitment to the assurance of consumer satisfaction. An open declaration by the nation's consumer industries of their acceptance of one or the other of the two forms of consumer redress outlined here would constitute just such a recommitment.

Indeed, were either or both of these redress procedures in widespread use today it is unlikely that consumer dissatisfaction with the business system would be as great as it appears to be.

As to the optimal form of non-legal redress, the direct remedy of the money-back policy is preferable since it is accomplished between buyer and seller without need for intermediaries of any kind. Third-party mechanisms can be no more than a substitute for direct settlement, but every seller of consumer goods and services should look into the means by which dissatisfied consumers can be offered one or the other mode of redress.

Different needs of different companies all dictate against a universal approach to consumer remedies. But for *every* industry there is *some* form of redress that is attainable for sellers and fair to buyers.

We commend to every enterprise an unrelenting search for that system.

IV Case Studies: Responsive Practice in Action

To illustrate the application of the principles and recommendations and guidelines contained in this report, two brief case studies of corporate operations have been prepared.

The first is a statement of the policy of a major national retailer under the pseudonym of "Retailers, Inc.". "Retailers, Inc." is an actual firm and its statement is a verbatim copy of the policy distributed to the supervisory personnel of all its stores. It should be noted that a recent survey conducted by the Sub-Council indicates that the policies of "Retailers, Inc." typically reflect those of retailing as a whole. With minor variations, the money-back guarantee is offered by most large general retailers, some small and specialized ones, and virtually all of the food retailing industry.

Findings of the same survey were the basis for the composite description of "Household Products Manufacturers, Inc.", the second case study. Although there are wide differences in complaint handling among manufacturers, there are some similarities among makers of "small-ticket" products and also among "large-ticket" manufacturers. The distinction between the options open to manufacturers of inexpensive, high volume merchandise and those available to companies whose products constitute major consumer purchases is carefully preserved, resulting in a reasonably realistic composite of model complaint handling by manufacturers of consumer products.

Example A
RETAILERS, INC.
". . . satisfaction guaranteed"

"Retailers, Inc." is a retailer, headquartered in a large midwestern city, whose divisions include department stores, discount operations, and general merchandise retailing. It has well over a thousand stores in all parts of the country. The following policy statement is given to all its store personnel.

"The following *REFUND POLICY* is more clearly and emphatically stated than ever before. It is to be followed

in *ALL* stores, in *ALL* departments, for *ALL* merchandise, whether operated by Retailers, Inc. or by licensee. 'SATISFACTION GUARANTEED OR YOUR MONEY CHEERFULLY REFUNDED'

"This is the ultimate promise which any retailer can give a customer. Each customer must be convinced we mean what we say in this policy, whether we refund all or part of the purchase price. Regardless of how unfair we may think a customer's attitude is in some instances our responsibility is clear—*the customer must be completely satisfied.*

"If fully followed, with the accent on cheerfulness and regardless of cost, it will insure the present and future success of our company. If we fail to fully discharge our promise, we have violated our high standards of honest merchandising.

"Our promise cannot be confined to a specific dealer's or manufacturer's guarantee or warranty on any product. If necessary we must go beyond such warranties to completely satisfy the customer.

"Satisfaction cannot be avoided by insistence upon a sales slip or a register receipt as proof of purchase. If the customer has lost the receipt, a refund will still be given.

"We must make good to our customer any violation of this policy by any licensee doing business under our name, whether the article is food, tires, batteries, or any merchandise or service. Corrective action will thereafter be taken with our licensee to avoid any repetition.

"All employees of Retailers, Inc. and its licensees are charged with the responsibility of *cheerfully* fulfilling this advertised policy. Supervisory employees and department managers are responsible for each and every customer being completely satisfied or having their money cheerfully refunded."

Example B
HOUSEHOLD PRODUCTS MANUFACTURERS, INC.
"... replacement, refund, and mediation"

"Household Products Manufacturers, Inc." (HPM) is a national manufacturer of consumer products. It operates through two divisions: the Small Products Division makes certain household wares and fixtures which retail in the $5 to $20 range. The Large Products Division makes appliances which retail from $100 to $500. HPM has plants in ten states and markets its products nationally through wholesale distributors and thence to retail outlets of various kinds. HPM's sales are divided fairly evenly between the two divisions.

In the main, complaints concerning HPM's products come either directly from consumers or are relayed from retailers. Each division has its own unit for handling consumer complaints and correspondence, but the units report to the Director of Corporate Consumer Relations rather than to divisional management. These units are thus encouraged to regard themselves as independent of manufacturing and marketing functions. The Director of Corporate Consumer Relations reports to HPM's Vice President for Public Affairs who in turn reports to the Company's chief executive officer.

Approximately 25 percent of all consumer correspondence received by HPM's units are complaints about product quality, service generally, or service under warranty. This 25 percent translates into about 10,000 complaints annually, divided about evenly between the two divisions. Thus, each division receives about one complaint for every $100,000 in sales, a small increase from previous years.

In terms of units sold, however, the ratio of complaints received by the Large Products Division is one per 400 units, while the Small Products Division receives one complaint per 10,000 units, a differential of 25:1.

This differential largely reflects the greater complexity of Large Products Division goods, and the problems inherent

in warranty fulfillment and servicing since HPM maintains high quality control standards over all its output.

The divisional complaint units handle consumer complaints (and all other consumer correspondence) as follows:

Each letter received is acknowledged within 48 hours of receipt. If at all possible, the reply is complete and requires no follow-up. If this is not possible, a full response is made within two weeks. If the complaint involves a question of personal injury or liability, responsibility for handling it is transferred to the corporate Legal Department which, however, is obliged to consult with the Corporate Director of Consumer Relations on any final settlement. All other complaints are handled directly by the complaint units.

About 80 percent of all consumer communications can be answered via one of 73 model letters which are prepared by automatic typewriting equipment producing a letter individually addressed and typed to the consumer. The remaining 20 percent require a completely individual reply, either by letter in most instances, by telephone in the bulk of the remainder, or in person by management personnel in a few cases. Personal visits are of two types: either in response to a complaint which appears to require on-location inspection of the problem, or as part of a follow-up process under which a sampling of purchasers are visited to determine the degree of their satisfaction with HPM's handling of their complaint.

HPM does accept collect long-distance calls from consumers who have complaints or questions about HPM products. When such calls come in, the name and telephone number of the caller are determined so that company personnel can immediately call back on the company WATS line.

Each of HPM's divisions has its own redress procedure.

Goods of the Small Products Division are covered by a limited money-back guarantee and by a replacement warranty. If within ten days after purchase, the consumer is dissatisfied with the product, he may return it to the retailer

who is authorized to replace it with a similar HPM product, or to give a full refund, at the consumer's option. In either event, the retailer is reimbursed the full retail price by HPM so that he does not lose by the return. The replacement-or-refund guarantee does not apply in the case of willful damage or gross negligence by the consumer.

After the ten-day period, defects which emerge during the long-term warranty period are handled by repair or replacement (at HPM's option).

Items produced by the Large Products Division are handled somewhat differently. No refund policy applies, but products are covered by long-term parts-and-service warranties supplemented by post-warranty service contracts. HPM makes every effort to satisfy unhappy consumers, but also utilizes an industry-sponsored third-party complaint mediation service. HPM binds itself to accept the recommendation of the panel and so informs its customers via a notice contained in the product's operating instructions. The consumer has recourse to legal remedies if he is dissatisfied with both the company's response to his complaint as well as the judgment of the industry-sponsored, though independently operating, complaint panel.

Each month, both of the divisional complaint units file statistical reports to divisional managements and the Corporate Director of Consumer Relations on the size, nature, and disposition of complaints and on the handling of other consumer correspondence. Attached to the reports are reproductions of actual complaint letters received on a preselected date during the month and these are circulated with the statistical reports to the company Vice President for Public Affairs and other top corporate and divisional officers.

Once each quarter, the Corporate Director of Consumer Relations reports on problems which are cropping up with some frequency in consumer complaints and makes recommendations concerning possible ways in which the more commonly voiced complaints can be reduced.

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